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and Shelly Singhal*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>IN RE XINHUA FINANCE MEDIA, LTD. SECURITIES LITIGATION</p> <p>This Document Relates To:</p> <p>ALL ACTIONS</p>	<p>MASTER FILE 07 Civ. 3994 (LTS)</p> <p>SUPPLEMENTAL DECLARATION OF GIDEON A. SCHOR RE REPLY MEMORANDUM IN SUPPORT OF XINHUA DEFENDANTS' MOTION TO DISMISS CONSOLIDATED AMENDED CLASS ACTION COMPLAINT FOR VIOLATIONS OF FEDERAL SECURITIES LAWS</p>
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I, Gideon A. Schor, declare that:

1. I am an attorney with the New York, New York office of the law firm of Wilson Sonsini Goodrich & Rosati, counsel for defendants Xinhua Finance Media, Ltd. ("Xinhua" or the "Company"), Fredy Bush and Shelly Singhal (collectively, "Xinhua Defendants"). I submit this declaration in support of the Xinhua Defendants' Reply Memorandum of Law in Support of Their Motion to Dismiss Consolidated Amended Class Action Complaint. Unless otherwise stated, the following facts are within my personal knowledge or are based on review of public records.

2. Attached hereto as Exhibit 8 is a true and correct copy of an excerpt from the docket sheet in *National Account Management Inc. et al. v. Shelly S. Singhal et al.*, No. 8:07-cv-00333 (C.D. Cal. filed Mar. 21, 2007), showing docket entry 166 on February 4, 2008 (“Minutes of Motion Hearing held before Judge James V. Selna The motion to Dismiss the FAC with prejudice as to defendants Singhal, Martin and SBI-Brightline is granted.”), and docket entry 202 on March 14, 2008 (“Minutes of Motion Hearing held before Judge James V. Selna The Court [grants] SBI’s Motion for Summary Judgment as to Plaintiffs Claims and rules in accordance with the tentative ruling”).

3. Attached hereto as Exhibit 9 is a true and correct copy of the Civil Minutes, March 14, 2008, Final Order Granting Defendants’ Motion for Summary Judgment, *National Account Management Inc. et al v. Shelly S. Singhal et al.*, No. 8:07-cv-00333 (C.D. Cal. filed Mar. 21, 2007).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of May, 2008, at New York, New York.

/s/ Gideon A. Schor
Gideon A. Schor